

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO. 4:19-cr-00341

v.

JOSE M. GONZALEZ-TESTINO,

Defendant.

_____ //

**DEFENDANT, JOSE M. GONZALEZ-TESTINO'S
UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL MOTION FOR
CHANGE OF CONDITIONS OF RELEASE**

Defendant, Jose Manuel Gonzalez-Testino, respectfully files this unopposed motion to leave to seal Gonzalez-Testino's for Change of Conditions of Release, and proposed order granting same. In support of this motion, counsel avers as follows:

1. The agreed motion and proposed order contains private, not-publically available information.
2. Previously, a popular Venezuelan blog had reported that this Court granted Mrs. Maria Alejandra Diaz's motions to travel to Madrid and London.
<https://www.maibortpetit.info/2020/03/juez-estadounidense-aprueba-liberar-los.html>.
3. Mr. Gonzalez-Testino has reason to be, and continues to be, concerned that his and his family's safety will be compromised if the agreed motion and order are made public.
4. This Court previously granted motions to seal docket entries which contained private information, e.g. DE 86 and DE 68, for the same purpose.

WHEREFORE, Defendant Jose Manuel Gonzalez-Testino moves this Honorable Court to seal Mr. Gonzalez-Testino's Agreed Motion for Change of Conditions of Release and proposed order filed simultaneously herewith.

CERTIFICATE OF CONFERENCE

The undersigned counsel of record for the Defendant, Jose Manuel Gonzalez-Testino, hereby certifies that he has conferred with DOJ Trial Attorney Sarah Edwards who states that she has no objection to this motion.

Respectfully submitted,

JONES WALKER LLP

201 S. Biscayne Blvd.

Suite 2600

Miami, Florida 33131

Telephone: 305-679-5700

Facsimile: 305-679-5710

/s/ Edward R. Shohat

SDTX Fed. Id. No. 3282621

Email: eshohat@joneswalker.com

/s/ Jon A. May

SDTX Fed. Id. No. 973034

Email: jmay@joneswalker.com

/s/ Monique Garcia

Texas Bar No. 24094671

Email: mgarcia@joneswalker.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this 30th day of December, 2020, I caused to be electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify the foregoing document is being served this day on all counsel of record either via transmission of Notices of Electronic Filing generated by CM/ECF or in another authorized manner for those counsel or parties not authorized to receive electronically Notices of Electronic Filing.

/s/ Edward R. Shohat

EDWARD R. SHOHAT